

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CASE NO 18-04639 MCF

WANDA IVELISSE HERNANDEZ DE LA ROSA

CHAPTER 13

DEBTOR

**DEBTOR'S REPLY TO *TRUSTEE'S REPORT ON CONFIRMATION*  
DOCKET NO. 13**

TO THE HONORABLE COURT:

**COMES NOW, WANDA IVELISSE HERNANDEZ DE LA ROSA**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

**1.** The Chapter 13 Trustee filed a *Trustee's Report on Confirmation*, Docket No. 13, objecting the confirmation of Debtor's proposed *Amended Chapter 13 Plan* (Docket No. 03) basically stating the following:

---the Debtor to review and provide evidence of medical expenses;  
---that the Debtor should include a credit on the Debtor's residential real property in Schedule A/B; and  
---that BPPR claims that its POC #2 be paid in full through the Plan and that the Debtor to inform course of action concerning BPPR's treatment under the Plan.

**2.** The Debtor respectfully replies to the Trustee's report as follows

---that on March 05, 2019, the Debtor filed *Amended Schedule "J"*, Docket No. 19, to review and amend the "medical expenses" item previously reported

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**Reply to Trustee's Unfavorable Report**  
**Case no. 18-04639 MCF13**

---that the Debtor also submitted to the Chapter 13 Trustee (uploaded to the Trustee's system) a copy of the Debtor's medical expenses summary for the period of time from January/2018 through October/2018;

---that the Debtor also filed *Amended Schedule A/B*, Docket No. 18, to inform the aforesated credit on the Debtor's residential real property;

---that the Debtor filed an *Amended Chapter 13 Plan*, Docket No. 17, whereby BPPR's direct post-petition payments made by the Debtor are specifically provided for; and

--- that the Debtor is attaching to the present Reply copy of the Debtor's direct post-petition mortgage loan payments made to BPPR for the months of December/2018, January/2019 and February/2019. The Debtor is current in the direct post-petition payments to secured creditor BPPR.

**3.** The Debtor hereby respectfully responds to the Trustee's unfavorable report on Plan confirmation, Docket No. 13, in the above captioned case.

**WHEREFORE**, the Debtor respectfully prays that Trustee's unfavorable recommendation, Docket No. 13, be denied and the Debtor's proposed *Amended Plan*, Docket No. 17, be confirmed.

**I HEREBY CERTIFY** that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following CM/ECF non-participant: Debtor, Wanda Ivelisse Hernandez de La Rosa, RR 4 Box 2888 Bayamon PR 00956, in the above captioned case.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 5<sup>th</sup> day of March, 2019.

/s/**Roberto Figueroa Carrasquillo**  
USDC #203614  
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